

**From:** [Tucker, Jacob P.](#)  
**To:** ["Yetta G. Kurland"](#); [David B. Rankin](#); [Tala Alfogaha](#)  
**Cc:** [Minicucci, Lora \(LAW\)](#); [Phillion, Rachel S.](#); [Hurd, Steven D.](#)  
**Subject:** NYC (Local 2507) - Meet and Confer Follow Up  
**Date:** Tuesday, April 1, 2025 6:25:55 PM

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Yetta –

We are circling back on what the parties each agreed to look into following last week's meet and confer. First, we reviewed Paragraph 1 in your March 5, 2025, letter and confirmed that the language did match the revised Interrogatory No. 3 from your April 24, 2023 Interrogatories. In response, we direct you to the City's May 1, 2023, response, which answers, in part: "...Defendant states that no individual can be identified because no such compensation studies have been performed between 2016 to present. DCAS performs compensation studies only for newly-created civil service titles and none of the relevant tiles in this action have been created since 2016." Based on our discussions during the meet and confer we believe this answers your question. Let us know if you want to discuss further.

We also wanted to check in on a few items you agreed to get back to us on so that we could have further discussions with our client to see if the parties can make progress on the following issues:

- **Injury and illness data.** Plaintiffs agreed to provide statutory references regarding reporting obligations you believe the City has to state and "outside agencies" as well as specific examples of such reports.
- **911 CAD data.** Plaintiffs agreed to provide us with bullet points identifying the specific information you believe is missing from the produced dataset.
- **Temporal scope.** Plaintiffs agreed to discuss whether they were willing to limit the temporal scope of any of the requests that seek information back prior to 2016.
- **Supplementing production.** Plaintiffs agreed to propose a date by which the parties would agree to supplement productions to bring them up to date. We discussed the possibility of two dates, with an earlier one for data so that experts will have the necessary time to review.

We are in the process of looking into the SH-900.1 reports and whether there is any additional way to provide data on the frequency and/or severity of injuries and will get back to you as soon as we can on those topics.

Best,

**Jake Tucker**

Attorney at Law

[Proskauer](#)

Eleven Times Square

New York, NY 10036-8299

d 212.969.3857

f 212.969.2900

[jtucker@proskauer.com](mailto:jtucker@proskauer.com)

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